1	Jonathan Gross, State Bar No. 121010
2 3 4	jgross@moundcotton.com Lawrence Hecimovich, State Bar No. 129688 lhecimovich@moundcotton.com MOUND COTTON WOLLAN & GREENGRASS, LLF 2200 Powell Street, Suite 1050 Emeryville, California 94608 Telephone: (510) 900-9371
5	Facsimile: (510) 900-9381
6	Attorneys for Defendant TEROS ADVISORS, LLC
8	IN THE UNITED STATES DI
9	FOR THE NORTHERN DISTRIC
0	

STRICT COURT CT OF CALIFORNIA

MARSH & MCLENNAN AGENCY, LLC, a Case No. 4:20-cv-02679-HSG Delaware limited liability company, ADMINISTRATIVE MOTION AND Plaintiff, ORDER DENYING TO CHANGE DEADLINE FOR FILING MOTION FOR SUMMARY JUDGMENT TEROS ADVISORS, LLC, a California limited liability company, Defendant. Judge: Hon. Haywood S. Gilliam, Jr. TEROS ADVISORS, LLC, a California limited liability company, MMA Complaint Filed: April 17, 2020 Trial Date: TBD Counter-Claimant. MARSH & MCLENNAN AGENCY, LLC, a Delaware limited liability company,

Counter-Defendant.

- 1. On February 11, 2021, Defendant Teros Advisors, LLC's filed its Motion for Judgment on the Pleadings. Teros set that motion for the earliest possible date on the Court's Calendar, June 3, 2021.
- 2. The court heard Defendant's motion on June 3, 2021. The Court appeared to indicate that it intended to grant Defendant judgment as to part or all of Plaintiff's Complaint.
 - 3. The court has not yet ruled on the motion for judgment on the pleadings.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

- 4. The last day to file motions for summary judgment is currently set for July 8, 2021.
- 5. Defendant respectfully requests that the Court change the dipositive motion filing deadline to thirty (30) days after the Court rules on Defendant's motion for Judgment on the Pleadings, which was heard on June 3, 2021.
 - 6. Defendant has not previously asked the Court to change this deadline.
- 7. This change is necessary because Defendant is unable to frame its motion for summary judgment in such a way as to avoid unnecessary pleading and argument.
- 8. Changing the dispositive motion cut-off will not affect any other deadlines in this case, as the pre-trial conference is not set until November 2, 2021.
- 9. The opposing side has not agreed. I tried to obtain the opposing party's agreement to this change.

I declare under penalty of perjury that the above statements are true and correct.

Dated: July 2, 2021 Respectfully submitted,

> By: /s/Lawrence Hecimovich Lawrence Hecimovich Attorneys for TEROS ADVISORS, LLC

The motion is DENIED.

IT IS SO ORDERED.

DATED: 7/6/2021

